



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
HUNTINGTON DIVISION

EDWARD "JESSE" DREYFUSE

3534873

Plaintiff

(Enter above the full name of the plaintiff
or plaintiffs in this action).

(Inmate Reg. # of each Plaintiff)

VERSUS

CIVIL ACTION NO. 3:17-cv-4031

(Number to be assigned by Court)

CHRISTOPHER D. CHILES, in his individual capacity
SEAN HAMMERS, in his individual capacity
RYAN BENTLEY, in his individual capacity

DEFENDANT'S

(Enter above the full name of the defendant
or defendants in this action)

COMPLAINT

I. Previous Lawsuits

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment?

Yes No /

B. If your answer to A is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline).

1. Parties to this previous lawsuit:

Plaintiffs: _____

Defendants: _____

2. Court (if federal court, name the district; if state court, name the county);

3. Docket Number: _____

4. Name of judge to whom case was assigned:

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

6. Approximate date of filing lawsuit: _____

7. Approximate date of disposition: _____

II. Place of Present Confinement: N.C. Moundsville, W.V.

A. Is there a prisoner grievance procedure in this institution?

Yes 1 No _____

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?

Yes _____ No 1

C. If you answer is YES:

1. What steps did you take? _____

2. What was the result? _____

D. If your answer is NO, explain why not: NOT RELATED TO

The 42 U.S.C. § 1983 CAUSES FOR ACTION

III. Parties

(In item A below, place your name and inmate registration number in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

A. Name of Plaintiff: EDWARD "JESSE" DREYFUSE

Address: 112 N.R.C. Dr. Moundsville, W.V. 26041

B. Additional Plaintiff(s) and Address(es): _____

(In item C below, place the full name of the defendant in the first blank, his/her official position in the second blank, and his/her place of employment in the third blank. Use item D for the names, positions, and places of employment of any additional defendants.)

C. Defendant: CHRISTOPHER D. CHILES

is employed as: CABELL COUNTY JUDGE - prior prosecutor

at CABELL COUNTY COURT HOUSE, HUNTINGTON, W. Va.

D. Additional defendants: SEAN HAMMERS, CABELL COUNTY

PROSECUTOR'S OFFICE,

RYAN BENTLEY, HUNTINGTON POLICE DEPARTMENT

IV. Statement of Claim

State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

Due to the complex nature and issues of this
action, it is impossible for me to properly
"Briefly" state the facts of this case -
Please Review the 16 Handwritten pages
that detail the 6 different causes for actions
and the claims for which Reliefs are sought,
including the Reliefs sought for EACH
claim accordingly.

IV. Statement of Claim (continued):

V. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

Due to the complex nature of the Reliefs
sought in this action it is impossible for me
to properly "briefly" state the Reliefs
sought, please review the 16 Handwritten
Pages attached that fully and properly
detail the Reliefs sought for the six
causes for actions claimed

V. Relief (continued):

VII. Counsel

A. If someone other than a lawyer is assisting you in preparing this case, state the person's name:

B. Have you made any effort to contact a private lawyer to determine if he or she would represent you in this civil action?

Yes _____ No ✓

If so, state the name(s) and address(es) of each lawyer contacted:

If not, state your reasons: _____

C. Have you previously had a lawyer representing you in a civil action in this court?

Yes _____ No ✓

If so, state the lawyer's name and address:

Signed this _____ day of _____, 20 ____.

Edward J. Preysel
Signature of Plaintiff or Plaintiffs

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 9/20/17.
(Date)

Edward J. Preysel
Signature of Movant/Plaintiff

Signature of Attorney
(if any)

EDWARD JESS DREYFUSE,

Plaintiff, Pro Se

v.

CHRISTOPHER D. CHILES, in his individual capacity

SEAN HAMMERS, in his individual capacity

RYAN BENTLEY, in his individual capacity

Defendants

CAUSES OF ACTION UNDER 42 U.S.C. § 1983

Plaintiff seeks to assert against the Defendants six separate causes of action claims that are presented and supported by (1) The deprivation and violation of Plaintiff's Constitutional Rights while Defendants acted under color of state law; (2) A Scheme and Conspiracy by Defendants to obstruct justice and to interfere with Plaintiff's Constitutional Rights while acting under the color of state law; and (3) Defendants violations of Constitutional Rights and various Federal and state Criminal Statutes, as; 18 U.S.C. § 34 misprision of felony; 18 U.S.C. § 1621 Perjury; 18 U.S.C. § 1622 Subornation of Perjury; 18 U.S.C. § False Declarations before a Grand Jury or Court; 18 U.S.C. § 241 Conspiracy against Rights; 18 U.S.C. 1001 Fraudulent and false statements; and the analogous state Criminal Statutes, § 61-5-1(b) Perjury, § 61-5-1(A) Subornation of Perjury, and § 61-10-31 Conspiracy.

Based upon these alleged unlawful acts, under 42 U.S.C. § 1983 provides for a private right of action against ANY person who under the color of law, Deprives another person of Rights Secured by the United States Constitution or Federal law.

Plaintiff Serves Notice Upon EACH Defendant That They Are being sued in their individual capacity for six CAUSES OF ACTION CLAIMS under 42 U.S.C. § 1983, Herein After referred TO AS A "CAUSE FOR ACTION".

Plaintiff Presents and hereby serves a Demand for Jury Trial on all issues so triable Pursuant to the Federal Rules of Civil Procedure Rule 38, and includes the Service of the written Demand in this Pleading upon each Defendant And The Court Pursuant to Rule 5(b).

CAUSES FOR ACTION

(Claim 1) AS A FIRST CAUSE FOR ACTION AGAINST Christopher D. Chiles, A Prosecuting ATTORNEY, Sean Hammers, AN ASSISTANT PROSECUTOR, And Ryan Bentley, A Huntington Police Officer, Plaintiff Alleges in the complaint The Claim That The Rights of LIBERTY, Due Process and equal protection of law, under the Fourteenth Amendment of the United States Constitution were intentionally in "Bad Faith" deprived and violated As Described in the following "Complaint," which ALSO SUPPORTS THE FIVE ADDITIONAL CAUSES OF ACTIONS AND CLAIMS FOR RELIEFS.

"COMPLAINT"

Christopher D. Chiles, A Prosecuting ATTORNEY And Sean Hammers, AN ASSISTANT PROSECUTOR, did Knowingly And willingly induce And Procure The Subornation of Perjured Testimony of Ryan Bentley, A Huntington Police officer who did Knowingly And willingly give fraudulent, felonious And intentionally misleading

False, Fabricated Testimony of evidence and material matters Before a Grand Jury in Cabell County West Virginia, U.S.A. on June nineteenth, 2012 TO WIT:

Commencing at 2:05 P.M. Before a Grand Jury in Cabell County West Virginia, U.S.A. on June 19th, 2012, Christopher D. Chiles, A Prosecuting Attorney being assisted By Sean Hammers As An Assistant Prosecutor Did Knowingly, willingly, intentionally And Feloniously induce, Procure And Suborn The Perjured Testimony of Ryan Bentley, A Huntington Police officer, A witness under OATH and Affirmation before A Grand Jury Considering a Felony indictment, who, being duly sworn, Deposed And gave false, Fabricated evidence of Testimony of material matters to the Grand Jury in the substance and to the effect following;

(A) Christopher D. Chiles, A Prosecuting Attorney under the assistance of a conspiracy with Sean Hammers, An Assistant Prosecutor, did in Bad Faith, Knowingly and willingly, intentionally and feloniously Procure and induce And Suborn The Perjured Testimony of Ryan Bentley before the afore described Session of The Grand Jury, against The Peace and Dignity of The STATE of WEST VIRGINIA and The UNITED STATES of America in violation of § 61-5-1(A) Subordination of Perjury and 18 U.S.C. § 1622 Subordination of Perjury, 18 U.S.C. 1623 False Declarations before a Grand Jury, and 18 U.S.C. 2-41 Conspiracy against Rights.

(B) wherein, Ryan Bentley, a witness under oath and Affirmation Before a Grand Jury, being induced and procured by Christopher D. Chiles under the assistance of Sean Hammers did in Bad Faith, knowingly and willingly, fraudulently, falsely and feloniously provide the perjured testimony of Evidence and material matters in the substance and to the effect following, "ms. Drefuse obtained a black aluminum baseball bat and struck Mr. Clay about the face and Head... multiple times causing the following injuries... multiple facial fractures and a major skull fracture that caused Mr. Clay to slip into a coma until he died as a result of the injuries, in which, according to all medical records and reports that were in EACH OF THE DEFENDANT'S possession, BEFORE and DURING the Grand Jury proceedings establishes that ALL OF THE DEFENDANT'S were fully aware and possessed ACTUAL evidence that ms. Clay NEVER received or suffered any type of multiple facial fractures or a major skull fracture, NOR did ms. Clay slip into a coma from such NON-EXISTING injuries, AS WAS PRESENTED in BAD FAITH, in perjured testimony as a material matter to a Grand Jury considering a felony indictment.

¶ COMPLAINT'S CONCLUSION ¶

(claim 1)
removed)

Pursuant to a 42 U.S.C. § 1983, The first cause for action (claim 1) is based upon the Defendant's violating the Plaintiff's Fourteenth Amendment rights of Due process and equal protection of law and also for inflicting cruel and unusual punishment against the Plaintiff.

in violation of the Eighth Amendment of the United States Constitution as a result of the Defendants Depriving the Plaintiff Rights Secured by the United States Constitution and their Violating Federal Laws AS Detailed.

RELIEFS SOUGHT

- 1) Plaintiff seeks the relief of an award of \$250,000.00 in Compensation Damages, Jointly and Severally, Against Christopher D. Chiles, Sean Hammers and Ryan Bentley in their individual capacities for the Constitutional Deprivations and violations of the Plaintiff's Fourteenth and Eighth Amendments of the United States Constitution and all Afore Described violations of Federal Laws.
- Plaintiff seeks the relief of an award of \$1,000,000.00 in
- 2) Exemplary Punitive Damages, Jointly and Severally, Against Christopher D. Chiles, Sean Hammers and Ryan Bentley in their individual capacities for the Constitutional Deprivations and violations of the Plaintiff's Fourteenth and Eighth Amendments of the United States Constitution and all Afore described violations of Federal Law causing Plaintiff contumely, loss of consortium, Public humiliation, oppression, mental anguish and other injuries suffered from the cruel and unusual punishment.
- 3) Plaintiff seeks the relief of an award in such sum as in the opinion of a Jury that is warranted by the circumstances for both, Compensation and Exemplary Punitive Damages should they determine an award other than what petitioned / requested by Plaintiff as Reliefs.

(Claim 2) AS A SECOND CAUSE OF ACTION AGAINST CHRISTOPHER D. CHILES, SEAN HAMMERS AND RYAN BENTLEY, PLAINTIFF ALLEGES IN THE COMPLAINT, PURSUANT TO 42 U.S.C § 1983 THAT CHRISTOPHER D. CHILES, SEAN HAMMERS AND RYAN BENTLEY OPERATED AND PARTICIPATED IN A CONSPIRACY TO OBSTRUCT JUSTICE BY INTENTIONALLY DEPRIVING THE PLAINTIFF DUE PROCESS AND EQUAL PROTECTION OF LAW UNDER THE FOURTEENTH AMENDMENT OF THE UNITED STATES CONSTITUTION AND FEDERAL LAW, TO ESTABLISH OBSTRUCTION OF JUSTICE AND THE DEPRIVATION OF DUE PROCESS AND EQUAL PROTECTION, PLAINTIFF IS REQUIRED TO DEMONSTRATE THAT CHRISTOPHER D. CHILES AND AT LEAST ONE OTHER DEFENDANT CONSPIRED TO OBSTRUCT THE COURSE OF JUSTICE IN A STATE COURT, AND DID SO WITH THE INTENT TO DEPRIVE THE PLAINTIFF OF A CONSTITUTIONAL RIGHT.

IT IS WITHOUT QUESTION THAT THE EVENTS ABOVE DESCRIBED IN ("COMPLAINT") PAGES 2 THROUGH 4 OF THIS ACTION, ESTABLISH AND DEMONSTRATE THAT CHRISTOPHER D. CHILES AND RYAN BENTLEY HAD PRIOR KNOWLEDGE THAT THE TESTIMONY BEING INDUCED AND PROCURED BY CHRISTOPHER CHILES WAS FALSE, AND THAT THE FALSE FELONIOUS TESTIMONY PROVIDED WAS PRE DETERMINED TO BE PROVIDED - THUS, A CONSPIRACY WAS COMMITTED, THERE CAN ALSO BE NO QUESTION THAT THIS FELONIOUS PRESENTMENT OF INDUCED TESTIMONY WAS MEANT TO OBSTRUCT JUSTICE, AS IT WAS DONE WITH THE FULL INTENT TO DEPRIVE THE PLAINTIFF OF THE CONSTITUTIONAL RIGHT OF DUE PROCESS AND EQUAL PROTECTION AND LIBERTY UNDER THE FOURTEENTH AMENDMENT OF THE UNITED STATES CONSTITUTION.

RELIEFS SOUGHT

- 1) Plaintiff seeks the relief of an award of \$ 150,000.00 in compensatory Damages, Jointly and Severally against Christopher D. Chiles, Sean Hammers and Ryan Bentley in their individual capacities for the Constitutional Deprivations and violations of the Plaintiff's Fourteenth Amendment of the United States Constitution and the intentional obstruction of Justice by conspiracy by the Defendant's to Deprive Plaintiff of said Constitutional Right.
- 2) Plaintiff seeks the relief of an award of \$ 450,000.00 in Exemplary Punitive Damages, Jointly and Severally against Christopher D. Chiles, Sean Hammers and Ryan Bentley in their individual capacities for the Constitutional Deprivations and violations of the Plaintiff's Fourteenth Amendment Rights under the United States Constitution and the afore described obstruction of Justice succeeded in a conspiracy to Deprive Plaintiff of a Constitutional Right, causing Plaintiff Contumely, loss of Consortium, public humiliation, oppression, mental anguish and Defamation of Character Slander, as Plaintiff was, and is called, and forever now Known as the "BAIL BAIT Killer" because of the false, fabricated Details Described in ("complaint") pages 2 through 4 of this action.
- 3) Plaintiff seeks the Reliefs of an award in such sum as in the opinion of a Jury that is warranted by the circumstances for both, compensatory and Exemplary punitive Damages should they determine an award other than what Plaintiff has requested by Plaintiff as Reliefs.

(Claim3)

AS A THIRD CAUSE FOR ACTION AGAINST CHRISTOPHER D. CHILES, SEAN HAMMERS AND RYAN BENTLEY, PLAINTIFF ALLEGES IN THE COMPLAINT PURSUANT TO 42 U.S.C. § 1983 THAT CHRISTOPHER D. CHILES, SEAN HAMMERS AND RYAN BENTLEY, ALL, WERE AWARE OF THE FELONY OFFENSES COMMITTED DURING THE GRAND JURY PROCEEDINGS AS DETAILED AND DESCRIBED IN ("COMPLAINT") PAGES 2 THROUGH 4 OF THIS ACTION, AND NOT ONE TOOK APPROPRIATE ACTION TO STOP SUCH FELONIES FROM BEING COMMITTED, NOR DID ANY OF THE DEFENDANTS BY THEIR HAVING KNOWLEDGE OF THE ACTUAL COMMISSION OF FELONY OFFENSES COGNIZABLE BY A COURT OF THE UNITED STATES NOR CONCEAL SUCH FELONIES BY REPORTING AND MAKING THE SAME KNOWN TO SOME JUDGE OR OTHER PERSON IN CIVIL AUTHORITY UNDER THE UNITED STATES SO AS TO PROTECT THE PLAINTIFF'S CONSTITUTIONAL RIGHTS OF DUE PROCESS AND EQUAL PROTECTION UNDER THE FOURTEENTH AMENDMENT OF THE UNITED STATES CONSTITUTION, AS EVERY DEFENDANT HAS IN FACT CONCEALED THE FELONY OFFENSES WHICH WERE COMMITTED. BY SUCH CONCEALMENT, CHRISTOPHER D. CHILES, SEAN HAMMERS AND RYAN BENTLEY STAND IN CLEAR VIOLATION OF FEDERAL LAW, 18 U.S.C. § 4. MISPRISION OF FELONY, AS WHOEVER HAVING KNOWLEDGE OF THE ACTUAL COMMISSION OF A FELONY COGNIZABLE BY A COURT OF THE UNITED STATES, CONCEALS AND DOES NOT AS SOON AS POSSIBLE MAKE KNOWN THE SAME TO SOME JUDGE OR OTHER PERSON IN CIVIL OR MILITARY AUTHORITY UNDER THE UNITED STATES, SHALL BE FINED UNDER THIS TITLE OR IMPRISONED NOT MORE THAN THREE YEARS OR BOTH,

PURSUANT TO 42 U.S.C. § 1983, THE THIRD CAUSE FOR ACTION CLAIM IS BASED UPON DEFENDANT'S, ACTING UNDER THE COLOR OF STATE LAW

intentionally depriving the Plaintiff the rights secured by the Fourteenth Amendment of the United States Constitution. By the Defendants intentionally concealing the Felony Offenses committed as Detailed and Described in ("complaint") pages 2 through 4 of this action, while each Defendant Did Exceed the scope of his official authority when they committed Felony Offenses intentionally to Deprive Plaintiff of his Constitutional Rights.

Reliefs SOUGHT

- 1) Plaintiff seeks an award of Relief of \$ 150,000.00 in compensatory Damages, Jointly and Severally against Christopher D. Chiles, Sean Hammers and Ryan Bentley in their individual Capacities for the Constitutional Deprivations and violations of the Plaintiff's Fourteenth Amendment Constitutional Rights suffered by the Defendants concealment of the Felony Offenses committed to insure Deprivation of Constitutional Rights.
- 2) Plaintiff seeks the relief of an award of \$ 450,000.00 in Exemplary punitive Damages, Jointly and Severally against Christopher D. Chiles, Sean Hammers and Ryan Bentley in their individual Capacities for the intentional concealment of the Felony Offenses in which were committed as Detailed in the ("complaint") "pages 2 through 4 of this action, to insure the Deprivation of the Plaintiff's Constitutional Rights.
- 3) Plaintiff seeks the Reliefs of an award in such amount as in the opinion of a Jury that is warranted by the Circumstances in both, compensatory and Exemplary punitive Damages should they determine an award other than what Plaintiff requested by Plaintiff as Reliefs.

(Claim 4) AS A FOURTH CAUSE FOR ACTION AGAINST CHRISTOPHER D. CHILES, SEAN HAMMERS AND RYAN BENTLEY, PLAINTIFF ALLEGES IN THE COMPLAINT PURSUANT TO 42 U.S.C. § 1983 THAT CHRISTOPHER D. CHILES, SEAN HAMMERS AND RYAN BENTLEY, ALL, ACTING UNDER THE COLOR OF STATE LAW, ACTED IN A CAPACITY OTHER THAN, AND WHICH DID EXCEED THE SCOPE OF EACH DEFENDANT'S AUTHORITY UNDER STATE LAW, AND CONTRARY TO THEIR OFFICIAL, AND, OR, QUASI JUDICIAL ROLES, AS THERE IS NO OFFICIAL OR QUASI JUDICIAL ROLE WHICH EXISTS THAT ALLOWS, MANDATES OR ENCOURAGES ANY OFFICIAL TO COMMIT FELONY OFFENSES OF FEDERAL OR STATE CRIMINAL STATUTES IN ORDER TO OBTAIN AN INDICTMENT UNDER FALSE PRETENSES OR TO DEPRIVE A PERSON DUE PROCESS AND EQUAL PROTECTION OF LAW UNDER THE FOURTEENTH AMENDMENT OF THE UNITED STATES CONSTITUTIONS.

RELIEFS SOUGHT

- 1) PETITIONER SEEKS THE RELIEFS OF AN AWARD OF \$ 50,000.00 IN COMPENSATORY DAMAGES, JOINTLY AND SEVERALLY AGAINST CHRISTOPHER D. CHILES, SEAN HAMMERS AND RYAN BENTLEY IN THEIR INDIVIDUAL CAPACITIES FOR THE CONSTITUTIONAL DEPRIVATIONS AND VIOLATIONS OF THE PLAINTIFF'S FOURTEENTH AMENDMENT CONSTITUTIONAL RIGHTS COMMITTED IN A CAPACITY OTHER THAN, AND WHICH DID EXCEED THE SCOPE OF EACH DEFENDANT'S AUTHORITY UNDER STATE LAW AND CONTRARY TO THEIR OFFICIAL, AND, OR, QUASI JUDICIAL ROLES.

2) Petitioner Seeks the relief of an award of \$ 150,000.00 in exemplary, punitive damages, Jointly and Severally Against Christopher D. Chiles, Sean Hammers and Ryan Bentley in their individual capacities for the constitutional Deprivations and Violations of the plaintiff's Fourteenth Amendment Constitutional Rights which were committed in a capacity other than, and which did exceed the scope of each defendant's authority under state law, and contrary to their official, and, or quasi judicial roles causing Plaintiff Contumely, mental anguish, Public Humiliation, Defamation of Character, Oppression, Slander and loss of consortium as the actions committed in a criminal manner by the defendant's has caused Plaintiff unimaginable irreparable injuries.

3) Plaintiff seeks the relief of an award in such sum as in the opinion of a jury that is warranted by the circumstances for both, compensatory and exemplary punitive damages, should they determine an award other than what petitioned/ requested by Plaintiff as Reliefs.

(Claim 5) As a Fifth cause for action against Christopher D. Chiles, Sean Hammers and Ryan Bentley, Plaintiff alleges in the complaint pursuant to 42 U.S.C § 1983, that while acting under the color of state law and exceeding the scope of their authorities under state law, Christopher D. Chiles, Sean Hammers and Ryan Bentley did Devise A Scheme or Artifice to Deprive the Plaintiff of the intangible Right of Honest Services in violation of 18 U.S.C. 1346 which makes it a federal criminal offense to Devise a Scheme or Artifice to Deprive another of Honest Services.

The important factor that must be proved is that the Defendant's engaged in conduct for the purpose of executing a scheme to deprive another the right of honest services. without question a scheme was devised and effectuated by the Defendant's where Christopher D. Chiles and Sean Hammers did knowingly and intentionally induce and procure by subornation the perjured, false, fabricated testimony of Ryan Bentley before a Grand-Jury so as to intentionally deprive the Plaintiff of the intangible Right of Honest Services of Public Officials during Grand Jury proceedings to be had with due process of law, and by such, Defendant's Deprived, Denied and violated the Plaintiff's Federal Law Rights of Honest Services and his Fourteenth Amendment Rights of the United States Constitution.

RELIEFS SOUGHT

- 1) Plaintiff seeks the relief of an award of \$ 30,000.00 in compensatory damages, jointly and severally against Christopher D. Chiles, Sean Hammers and Ryan Bentley in their individual capacities for the violations of 18 U.S.C. 1346, where the Defendant's devised and effectuated a scheme or artifice to deprive the petitioner the Right of Honest Services of Public Officials during Grand Jury proceedings to be had with due process of law, violating Plaintiff's Fourteenth Amendment Rights under the United States Constitution.

2) Plaintiff seeks the relief of an award of \$ 90,000.00 in Exemplary Punitive Damages, Jointly and Severally against Christopher D. Chiles, Sean Hammers and Ryan Bentley, in their individual capacities for the Violations of Rights secured under Federal Law under 18 U.S.C. § 1346, where Defendants Devised and effectuated a Scheme or Artifice to Deprive the Plaintiff the Right of Honest Services of Public Officials during a Grand-Jury proceeding to be had with Due Process and Equal Protection of Law, thus violating the Plaintiff's Fourteenth Amendment Rights of the United States Constitution, causing Plaintiff mental anguish, oppression, public humiliation, Defamation of Character, Slander, loss of Consortium, as the Plaintiff's name, Edward Jess Dreyfuse, is now forever synonymous with the "BaseBall Bat Killer" title given to him by cause of the Defendants actions described in ("Complaint") pages 2 through 4 of this action (Google "Dreyfuse, BASEBALL KILLER")

3) Plaintiff seeks the relief of an award in such sum as in the opinion of a Jury that is warranted by the circumstances, for both, compensatory and Exemplary Punitive Damages, should they determine an award other than what petitioned / Requested by Plaintiff as Relief.

(Claim 6) Lastly, as a sixth cause for action against Christopher D. Chiles, Sean Hammers and Ryan Bentley, Plaintiff alleges in the complaint pursuant to 42 U.S.C. § 1983 a claim of false Arrest and imprisonment on the grounds that the findings of probable cause made as to the Indictment was based on information known to be false.

Defendant's violated The United States Constitution's fourth amendment for the restriction of Plaintiff's liberty and freedom of movement that occurred when Plaintiff was held and imprisoned under an indictment that was obtained with Deliberate falsehood, fraud, and reckless disregard for the truth which resulted in the Plaintiff being illegally held without a bond and falsely imprisoned.

As the "tainted" wrongfully obtained indictment was had by the Defendant's inducing, procuring and suborning perjured testimony intentionally, and giving fraudulent, false, fabricated testimony of evidence and material matters, there is absolutely no question as to the Plaintiff's Detention being based on information which the state and Defendants knew to be false. Furthermore, the actual arrest warrant for the charge of murder was also obtained with the same fraudulent false affidavit of evidence and testimony as was provided at the Grand Jury proceedings, thus, Plaintiff's arrest warrant for murder was also based on information which the state and Defendants knew to be false, and in view of the nature of Plaintiff's claim--that his arrest and Detention for murder were based on information which the state and Defendants knew to be false--the false arrest and imprisonment claims are not effected by the fact that Plaintiff received formal procedures to which he was entitled under Gerstein, moreover, Gerstein makes CLEAR, "A STATE Grand Jury indictment is to be considered as EXACTLY EQUIVALENT TO A MAGISTRATE'S DETERMINATION OF PROBABLE CAUSE prior to the issuance of a WARRANT, see Gerstein 420 U.S. at 117, n. 19, 955 F.2d at 865.

A "Franks Claim" applies where the determination of probable cause is made by a state grand-jury, thus, Plaintiff brings his final claim under 42 U.S.C. 1983 claim of false arrest and imprisonment in violation of the fourth amendment of the United States Constitution on the ground that the findings of probable cause made was based on information the state and the defendant's knew to be false, as the defendant's intentionally presented the false, fabricated, fraudulent information themselves as detailed and described in ("complaint") pages 2 through 4 of this action.

RELIEFS SOUGHT

- 1) Plaintiff seeks the relief of an award of \$200,000.00 in compensatory damages against Christopher D. Chiles, Sean Hammers and Ryan Bentley, jointly and severally in their individual capacities for the fourth amendment of the United States Constitutional violation for the Plaintiff's being falsely arrested and imprisoned on the ground that the findings of probable cause made was based on information the state and the defendant's knew to be false
- 2) Plaintiff seeks the relief of an award of \$600,000.00 in exemplary punitive damages, jointly and separately against Christopher D. Chiles, Sean Hammers and Ryan Bentley, in their individual capacities for the fourth amendment of the United States Constitutional violations for the Plaintiff's being falsely arrested and imprisoned on the ground that the finding of probable cause made was based on information the state and defendant's knew to be false, causing Plaintiff irreparable loss of family and friends, oppression,

mental anguish, public humiliation, loss of consortium, slander, and defamation of character, as the plaintiff is now and forever known as the "Base Ball Bat Killer," who BEAT A mans Brains out of his head Because of the false, fraudulent information intentionally provided by the Defendants - (GOOGLE "EDWARD JESSE DREYFUSE" "BASE BALL BAT KILLER")

3) Plaintiff seeks the reliefs of an award in such sum as in the opinion of a jury that is warranted by the circumstances for both, compensatory and exemplary punitive damages should they determine an award other than petitioned / requested by Plaintiff as reliefs.

Plaintiff submits this action to the U.S. District Courts Clerk Teresa Deppener / Huntington Division Federal Courthouse, 845 Fifth Avenue, Room 101, Huntington, W.Va. 25701, Plaintiff further avers he has provided EACH Defendant service of a copy of this action by U.S. mail.

Pursuant to 18 U.S.C. § 1746, I, Edward Jesse Dreyfuse declare under the penalty of perjury that the foregoing is true and correct.

Edward Jesse Dreyfuse

Executed on -

DATE: 9/20/2017

CLERK,

Please find the enclosed 42 U.S.C. § 1983 action, financial, and the three copies of the 42 U.S.C. § 1983 with process for service upon the defendants.

AS THE ISSUES ARE NOT RELEVANT TO PRISON OR PRISON OFFICIALS, THERE ARE NO ADMINISTRATIVE REMEDIES AVAILABLE IN THESE MATTERS.

ALSO, JURISDICTION IS IN THE HUNTINGTON DIVISION, AS THE DEFENDANTS COMMITTED THE CONSTITUTIONAL VIOLATIONS IN HUNTINGTON WHILE ACTING UNDER THE COLOR OF STATE LAW.

I HAVE ALSO INCLUDED A MOTION FOR LEAVE TO FILE EXCESS PAGES AS A PRECAUTIONARY MEASURE AS THE RULES OF THE SOUTHERN DISTRICT U.S. COURT OF WEST VIRGINIA FOR FILING ARE NOT READILY AVAILABLE AT THIS FACILITY, BUT THE NORTHERN DISTRICT COURT RULES ARE, AND SUCH MOTION IS PURSUANT TO THE (LR PL 3.4.4).

IF SUCH MOTION IS NOT REQUIRED BY THE SOUTHERN DISTRICT COURT, PLEASE DISREGARD IT.

I THANK YOU FOR YOUR SERVICE AND ATTENTION IN THIS SERIOUS MATTER,

Ed T. Dryesse

Edward JESS DRAYER
112 N.R.C. Dr.
Moundsville, WV 26041



CLERK, UNITED STATES DISTRICT COURT
Sidney L. Christie Federal BLDG.
845 5TH AVENUE, RM 101
HUNTINGTON, WV

25701
U.S. MARSHALS SERVICE
X-RAYED

BY: _____

